ATTN: PL 106-107 Comments

Dear Administrators:
   We have two general comments that fall under Item I. Application and
Reporting Forms, Item II. Terms and Conditions and Item V. Electronic
Processing. The organization of these comments follows the format as
described in a Request for Comments published in the January 17, 2001
Federal Register (pp. 4584-4593).
Briefly, our institution has been involved in ERA since 1996, and has
submitted proposals electronically since 1997. I estimate that we are
among the highest 30% to 40% of institutions in terms of support we
provide to faculty with the various technical processes, and
institutional experience and technology on these issues.
Please see that these comments are registered with the appropriate
entities. Please also let us know if some type of summary of all
comments will likewise be published.
Thank you for the opportunity to respond.

     Asst. Vice Chancellor,
   Research and Sponsored Programs
      University of New Orleans
      New Orleans, LA 70148
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1. Outstanding models for electronic research administration
Your document refers to a "second cornerstone" of the act
implementation, that is "build on what has already been done or is
already underway."

The National Science Foundation is farther along than any other agency
with its development of a system to handle total electronic processing
(Fastlane). Fastlane has been in actual use with a wide audience
(i.e. not just a pilot) for almost 5 years, and thus, has the widest
and longest scope of experience in the endeavor of "Electronic
Research Administration."

Whether they should be the "lead" agency in PL 106-107 implementation
or not is a different question (i.e. they may not want it); however
they certainly should be a major player and should lobby to make
Fastlane the "model" for all the agencies.

First, Fastlane, while not perfect, is the most well-thought out model
in existence today, has incorporated lots of user input in its
development, and thus, represents the best model encapsulating both
what federal agencies need and what users need. Secondly, thousands
of institutions are experienced in its use; thus, expanding that use
among other federal agencies would only make sense in terms of a
learning curve. Thirdly, it's a proven and tested model. It has
demonstrated that it does work with a large degree of ease of use,
something the more recent models or those still under construction
cannot claim. Fourth, because the Fastlane model has been in
existence so long, it can claim more components in use today than any
other model. These components include but are not limited to:

proposal development and approval, proposal submission, proposal status checking, the reviewer process, awards notification, budget revision, electronic funds transfer and progress reporting. Finally, the Fastlane system includes a number of databases that make available extremely valuable reporting mechanisms for research administrators to manage their NSF activity.   These reports are extremely easy to generate and make available a large quantity of management information which is completely unavailable from other federal agencies unless we maintain it ourselves within our own database systems.

For all these reasons (and more) we highly recommend that Fastlane be under consideration as the major building block for the entire implementation of PL 106-107.

2. Institutional signature, electronic review and approval issues

We see a disturbing trend developing with some of the other agency attempts at electronic submission development. Two fairly recent systems in particular, eGAPS (now called e-Application) from the Department of Education and SYS-EYFUS from NASA have been developed without appropriate safeguard mechanism for the Research Administration office at institutions to exercise their required review and approval. These systems display a misunderstanding of the institutional role in proposal submission. With the large majority of federal awards, it is the institutions, i.e. not the individual faculty, who receive the award (with all its financial and academic obligations). Thus, internal approval mechanisms have been established within institutions to review what is being submitted before it gets submitted, and to correct any reference to obligations it cannot or may not be able to meet.

These two systems in particular (and a few private foundations) have been developed in such a way that the P.I. (faculty) can technically submit a proposal without any prior institutional approval. In fact, because of this flaw, people only marginally affiliated with an institution (or ineligible parties such as non-permanent faculty or students) may be able to submit proposals.

Nationally (through the Research Administrators listserve) there has been significant criticism from institutions on these issues. But thus far, the objections have not been raised in a formal enough fashion to prompt agencies to seek better input when delegating design of these electronic submission processes to outside consultants. Fastlane (from the National Science Foundation) is an example of an agency that has taken a very responsible approach to this aspect of its development; and has installed a series of checks and security mechanisms to guard against misuse of their system, to prevent unauthorized use and to insure that only approved and eligible parties are involved in the submission process.

We feel the systems (such as e-Application and SYS-EYFUS) by excluding such a mechanism for prior approval and processing control by Offices of Research, are irresponsible, will result in confusion, and will likely lead to loss of time and effort on the part of all concerned. Institutions will not accept awards for which they did not review, and which may commit them to obligations which were not pre-approved.